

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

JOE ANDREW SALAZAR,

Plaintiff,

v.

HTC CORPORATION and
AT&T, Inc.

Defendant.

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Civil Action No. 2:16-cv-01096-JRG-RSP

**DECLARATION OF DARIUSH KEYHANI IN CONNECTION WITH PLAINTIFF JOE
ANDREW SALAZAR'S MOTION FOR LEAVE TO CORRECT/AMEND PLAINTIFF'S
SECOND AMENDED ORIGINAL COMPLAINT**

I, Dariush Keyhani, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a member of Meredith & Keyhani, PLLC, and counsel for Joe Andrew Salazar ("Salazar"), the Plaintiff in the above captioned case. I write this declaration in support of Plaintiff's motion for leave to correct/amend Plaintiff's Second Amended Original Complaint.

2. On June 28, 2017, I received an email from Brian J. Gaffney, with the signature title, Assistant Vice President, Senior Legal Counsel IP Litigation, AT&T Services, Inc. In his email, Mr. Gaffney requested Plaintiff's consent to a 45 day extension for AT&T to answer or otherwise respond to Plaintiff's Second Amended Original Complaint.

3. I called Mr. Gaffney after receiving his email. During the call Mr. Gaffney indicated that he represented AT&T, Inc. He also indicated that with respect to Plaintiff's claims brought against AT&T, Inc. in connection with the accused HTC smartphone products AT&T Mobility LLC was the correct corporate entity to be named as a defendant. During the call, on

behalf of the Plaintiff I consented to AT&T's request for a 45 day extension for it to answer or otherwise respond to Plaintiff's pleading.

Dated: July 14, 2017

Respectfully submitted,

s/ Dariush Keyhani
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